

**VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTH CENTRAL REGIONAL OFFICE**

**FACT SHEET
FOR PROPOSED PERMITTING ACTION
UNDER 9 VAC 5 Chapter 80 Article 1 (TITLE V-CLEAN AIR ACT)**

APPLICANT:

VA-30794 AIRS ID 51-083-0037
Lasco Bathware
Lot 5 Halifax Industrial Park
South Boston, VA 24592

FACILITY LOCATION:

Highway 58, 2 miles west of intersection of Highways 501 and 58 in Halifax County
UTM Coordinates are ZONE: 17 EASTING: 685.7 km NORTHING: 4060.6 km

FACILITY DESCRIPTION:

Lasco Bathware is a manufacturer of bathware covered by Standard Industrial Classification (SIC) Code 3088. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week, fifty-two (52) weeks per year. This plant produces fiberglass reinforced bath fixture molds and fiberglass reinforced acrylic bathtubs/showers.

EMISSIONS SUMMARY:

PLANTWIDE EMISSIONS SUMMARY [TONS PER YEAR]		
CRITERIA POLLUTANTS	POTENTIAL EMISSIONS	1996 ACTUAL EMISSIONS
PM	4.7	3.4
NOx	10.9	2.9
Volatile Organic Compounds (VOC)	226	171.8
HAPs EMISSIONS		
Styrene	226	165.6
Methyl ethyl ketone	0.8	0.6

TITLE V PROGRAM APPLICABILITY BASIS:

This facility has the potential to emit 226 tons per year of VOCs and styrene. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, and over 10 tons per year of a HAP, Lasco Bathware is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 9 VAC 5 Chapter 80 Article 1. Lasco has three NSR permits which cover the entire facility.

LEGAL AND FACTUAL BASIS FOR DRAFT PERMIT CONDITIONS:

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the Commonwealth of Virginia Federal Operating Permit Regulations for the purposes of Title V of the Federal Clean Air Act (9 VAC 5 Chapter 80 Article 1), and underlying applicable requirements in other state and federal rules. Applicable requirement means all of the following as they apply to emission units in a Title V source:

- a. Any standard or other requirement provided for in the State Implementation Plan or the Federal Implementation Plan, including any source-specific provisions such as consent agreements or orders.
- b. Any term or condition of any preconstruction permit issued pursuant to 9 VAC 5-80-10, Article 8 (9 VAC 5-80-1700 et seq.) of this part or 9 VAC 5-80-30 or of any operating permit issued pursuant to 9 VAC 5 Chapter 80 Article 5, except for terms or conditions derived from applicable state requirements or from any requirement of these regulations not included in the definition of applicable requirement.
- c. Any standard or other requirement prescribed under these regulations, particularly the provisions of 9 VAC 5 Chapter 40 (9 VAC 5-40-10 et seq.), 9 VAC 5 Chapter 50 (9 VAC 5-50-10 et seq.) or 9 VAC 5 Chapter 60 (9 VAC 5-60-10 et seq.), adopted pursuant to requirements of the federal Clean Air Act or under ' 111, 112 or 129 of the federal Clean Air Act.
- d. Any requirement concerning accident prevention under ' 112(r)(7) of the federal Clean Air Act.
- e. Any compliance monitoring requirements established pursuant to either ' 504(b) or ' 114(a)(3) of the federal Clean Air Act or these regulations.
- f. Any standard or other requirement for consumer and commercial products under ' 183(e) of the federal Clean Air Act.
- g. Any standard or other requirement for tank vessels under ' 183(f) of the federal Clean Air Act.
- h. Any standard or other requirement in 40 CFR Part 55 to control air pollution from outer continental shelf sources.
- i. Any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the federal Clean Air Act, unless the administrator has determined that such requirements need not be contained in a permit issued under this article.
- j. With regard to temporary sources subject to 9 VAC 5-80-130, (i) any ambient air quality standard, except applicable state requirements, and (ii) requirements regarding

increments or visibility as provided in Article 8 (9 VAC 5-80-1700 et seq.) of this part.

- k. Any standard or other requirement of the acid deposition control program under Title IV of the Clean Air Act or the regulations promulgated thereunder.
- l. Any standard or other requirement governing solid waste incineration under ' 129 of the Clean Air Act.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 9 VAC 5 Chapter 80 Article 1 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the state but is not federally-enforceable is identified in the draft Title V permit as such.

REQUEST FOR VARIANCES OR ALTERNATIVES:

None

PERIODIC MONITORING:

Since the mixing portion of this facility does not contain a permit limit for opacity, the opacity emission standard is the regulatory default of 20%. Therefore, it is Avirtually impossible@for a mixing process that emits dust controlled by a fabric filter to violate the opacity emission standard of 20%. As long as the particulate emissions are vented through a properly operating control device, in this particular case a fabric filter, there should be no visible emissions and the standards are easily attained. Weekly observations of the fabric filter exhaust stack are required. If visible emissions are found, corrective action must be taken. Visible emissions have been selected as the indicator because they are indicative of good operation and maintenance of a fabric filter. Periodic monitoring for the incinerator includes a device to continuously measure the temperature in the combustion zone as well as a means of determining gas discharge flow. Also, good operating written procedures for the incinerator must be developed, and a maintenance schedule will be established and made available to the DEQ for review. In addition, visual emission observations from the incinerator exhaust stack shall be conducted at least once per week. If visible emissions are observed, timely corrective action shall be taken such that the incinerator resumes normal operation and there are no visible emissions from the incinerator exhaust stack. Records shall be maintained, on site, stating the date and time of each visible emissions check and whether visible emissions were observed and any required corrective action taken. For the spraying processes, records of monthly and annual usage of all VOC-containing materials are required. These records include:

- annual throughput of polyester resin. The consumption shall be on a weight basis, corrected to 42% weight styrene monomer.
- annual usage of PVC “glue”, including VOC emissions therefrom.
- annual usage of gel coat and resin.

All records are calculated monthly as the sum of each consecutive twelve (12) month period and shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years. All heaters are fired by natural gas. Each heater is rated at 5.74 MBtu. Since the heaters are less than 10 MM Btu/hr, burn natural gas, and are used for space heat only, it can be shown that if properly maintained it is not possible for them to violate a SO₂, particulate matter, or opacity standard. Thus, adequate periodic monitoring is attained since the permit requires proper maintenance of the fabric filter, weekly inspections, visible emissions evaluations, and records of VOCs applied, and since the source burns natural gas and Condition III.A.3. requires proper maintenance. Also, the source has been inspected annually since 1984 and has been found to be in compliance each time. No visible emissions have been observed during inspections.

COMMENT PERIOD:

The public notice appeared in *The News & Record* on August 24, 2000.

Beginning Date: August 24, 2000

Ending Date: September 23, 2000

All written comments should be addressed to the following individual and office:

Frank Bowman
Senior Environmental Engineer
Department of Environmental Quality
South Central Regional Office
7705 Timberlake Road
Lynchburg, VA 24502
Phone: (804) 582-5120 Fax: (804) 582-5125

PROCEDURE FOR REQUESTING PUBLIC HEARING:

During the public comment period any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for a public hearing shall be in writing to the above address and shall state the nature of the issues proposed to be raised in the hearing. The Director shall grant such a request for a hearing if he concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
South Central Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Addendum to the September 14, 2001 Statement of Legal and Factual Basis as administratively
amended May 19, 2003

Lasco Bathware Inc.
Lot 5 Halifax Industrial Park, South Boston, Virginia
Permit No. SCRO30794

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Lasco Bathware Inc. has applied for a Title V Operating Permit for its South Boston facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____ Date: _____

Air Permit Manager: _____ Date: _____

Regional Director: _____ Date: _____

FACILITY INFORMATION

Permittee

Lasco Bathware Inc.
8101 E. Kaiser Blvd., Suite 130
Anaheim, CA 92808

Facility

Lasco Bathware Inc.
Lot 5 Halifax Industrial Park
South Boston, VA 24592

County-Plant Identification Number: 51-083-0037

PERMIT AMENDMENT INFORMATION

An NSR permit amendment was issued on April 21, 2005 to remove the minimum stack height from the Specific Condition 13 of the November 29, 1984 permit. Based on file information from the initial 1984 state minor NSR permit, the minimum stack height requirement was established to be consistent with the application information used in the dispersion modeling. The modeling was conducted to demonstrate that emissions for styrene complied with the Virginia's toxic air pollutant regulation that existed at that time. The affected line is now subject to the MACT standard for Reinforced Plastic Composites (40 CFR 63, Subpart WWWW) and therefore as provided in 9 VAC 5-60-300 C.4., is no longer subject to the state toxic pollutant standard. Because Lasco Bathware Inc. is no longer subject to the state's ambient air guideline for styrene, modeling for that pollutant is no longer applicable and the associated stack height restriction in the permit is no longer required.

Condition V. A. 6. has been changed to reflect the April 21, 2005 NSR amendment.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, was conducted on August 15, 2003. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

There are no changes in the emissions unit or emission unit's requirements.

Monitoring

There are no changes in monitoring.

Recordkeeping

There are no changes in recordkeeping.

Reporting

There are no changes to reporting.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

The general conditions were updated to include the current wording.

INSIGNIFICANT EMISSION UNITS

No additional insignificant units have been added.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit will be placed on public notice in the Gazette-Virginia from August 3, 2005 to September 2, 2005.